RESPONSE TO THE REJECTION

A proposed response to the objections to the drawings is attached as a redline drawing. Upon the Examiner's agreement that these changes accomplish what the Examiner requires, formal drawings will be submitted.

The Rejection of claims 1-4 and 15-24 under 35 USC 102(b) as anticipated by Takahashi (JP 06-118811)

The Comments of the Office Action attempting to respond to issues raised in the rejection assert that

Although the Takahashi reference (especially Figure 4) cited by the Examiner, shows a set of elements **5** that are truly electrically insulated from each other, these elements are not the electrically conductive layer, but rather are the electrodes (**5**) embedded in the electrically conductive layer (**3**). Additionally, even though these electrodes **5** are embedded in the conductive layer **3**, this structure does not meet the last limitation of claim 1 that the continuous set of electrodes **3, 5** shown in paragraphs [44] and drawing 4 of Takahashi are the same as the segments recited in the claims. As shown in original claims 15, 16 and 17, now incorporated into claim 1 and all other independent claims, the scope of the invention is limited to 1, 2, 3 or 4 segments, as opposed to the creation of a continuous set of electrodes in Takahashi, where there are **NINE** (9) electrodes shown in less than 90° of the roller surface circumference. This is a clear indication that the electrodes of Takahashi do not serve the same function as the 1, 2, 3 and 4 segments of the claimed technology.

As shown on pages 7 and 8 of the present specification, the objective of the segmenting is

> "...an image transfer belt (ITB), apparatus using the belt, and a method of using the belt in an imaging process that displays the benefits of the thin, flexible, coated belts described above, but additionally is segmented into electrically isolated regions **that allow different voltages to be placed at different locations along the same ITB for different steps and/or different qualitative results in the electrophotographic process**. This improvement allows for total system optimization of voltages and increases transfer efficiency.

That function cannot be provided by the continuous series of electrodes shown by Takahashi, which would require voltage control over each portion of even an individual image portion (because of the electrode density) and could not provide the capability provided by the 1, 2, 3 or 4 segments recited. This advantage is not obvious from the

teachings of Takahashi, as the unstated purpose of the electrodes does noyt lead one of ordinary skill in the art to either the benefit itself, the structure itself, or an awareness of potential benefits for 1, 2, 3 or 4 segments. The claimed invention is not taught by the art of record in the rejection.

Because the electrically conductive layer **3** of Takahashi is continuous beneath the electrodes and of uniform composition and thickness, there is a substantially uniform conductivity. The segments are not electrically isolated, as is recited now in all claims.

The structure provided by Takahashi has a continuous underlayer of conductive material in all examples shown in the specification and figures. A continuous layer of conductive material does not produce electrically isolated regions, as there is electrical conductivity between each of the parts of the continuous layer. Although the spacing of electrodes gives a physical appearance of segmentation, there can not be the functionally described electrical isolation recited in all claims of the present application in those visually separated regions of Takahashi. The rejection under 35 USC 102(b) cannot apply to the claims as amended.

The limitation of "electrically isolated" with regard to exactly 1, 2, 3 or 4 segments is believed to be present in every independent claim, so this argument applies to every claim in the application.

Claims 5 and 7-12 Have Been Rejected under 35 U.S.C. 103(a) As Unpatentable over Takahashi in view of Takahata (U.S. Patent No. 6,112,038)

Even assuming that Takahata discloses all of the information and teachings for which it has been cited in this rejection, which is not conceded, those teachings do not correct the underlying deficiencies of the Takahashi reference in failing to teach the "exactly 1, 2, 3 or 4 electrically isolated regions." As that concept and its effects have not been taught by references cited in this rejection, the rejection must fail.

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CONCLUSION

The present Application is now believed to be in condition for Examination and Allowance.

Respectfully submitted,

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By Their Representatives,

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CERTIFICATE UNDER 37 C.F.R. 1.8: The undersigned hereby certifies that this Transmittal Letter and the paper, as described herein, are being deposited in the United States Postal Service, as first class mail, with sufficient postage, in an envelope addressed to: Mail Stop: AF; Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450 on 3 February 2006

Mark A. Litman
Name

_____
Signature